

April 8, 1994

Ref: 8WM-WQ

Subject: EPA Region VIII Recreation Use
Attainability Analysis Worksheet

Dear State or Tribal Colleague,

In May of 1992 EPA Region VIII issued final guidance concerning water quality standards for recreation and the Clean Water Act (CWA) § 101(a)(2) "swimmable" goal. The purpose of the guidance was to supplement the national EPA guidance and to provide notice to States and Indian Tribes regarding the Region's expectations for upcoming triennial reviews. The guidance describes four options for achieving compliance with "swimmable" goal requirements and recommends a general process for application of recreation standards. The guidance generally recommends use of options 1, 2, or 3 in most cases to establish recreation standards that EPA considers "swimmable." However, option 4 of the guidance also recognizes that there may be some waterbody segments where it is unreasonable to apply "swimmable" standards. To address such situations in a manner that conforms to federal requirements, the guidance recommends that States and Tribes develop a standard use attainability analysis (UAA) worksheet to provide for a structured assessment of existing and potential recreation uses and to help document the basis for applying non-"swimmable" standards to particular segments.

To assist States and Tribes with developing water quality standards for recreation that comply with CWA "swimmable" goal requirements, enclosed is an EPA Region VIII recommended **Recreation Use Attainability Analysis Worksheet**. This worksheet may be used in completing recreation use attainability analyses (UAAs) for waters where "swimmable" water quality standards have not been applied. This worksheet is intended to be used in tandem with the approach described in Regional guidance dated May 28, 1992 (enclosed). States and Tribes may use this worksheet as is or make reasonable modifications. Any modifications should be discussed and approved by EPA Region VIII prior to use of the modified worksheet. Please note that, prior to granting approval of future triennial revisions, the Region will require submission of completed worksheets (such as the enclosed) or other appropriate documentation for all segments for which "swimmable" standards are not applied. Completed worksheets should also be included with proposed revision packages, or at least referenced in the public notices associated with proposed revisions, so that the public has an opportunity to review and comment on the completed UAA.

I hope this worksheet will assist States and Tribes to develop water quality standards that fully conform to CWA § 101(a)(2) "swimmable" goal requirements. If you have questions please call Bill Wuerthele, Region VIII Water Quality Standards Coordinator, at (303) 293-1586.

Sincerely,

Dale Vodehnal, Chief
Water Quality Branch

Enclosures (2)

Recreation Use Attainability Worksheet

I. LOCATION.

Name of Reviewer:
 Name of Waterbody:
 Basin:

Date of Assessment:
 County:
 Segment:

II. EXISTING USE.

Based on conversations with local residents, direct observation, or other appropriate information, are there any EXISTING primary contact recreation uses that are known to be present on a reoccurring basis? (If so, primary contact uses must be designated - skip to Part VI). Circle as appropriate: swimming, rafting, wind surfing, canoeing, kayaking, tubing, scuba diving, snorkeling, water skiing, other.

Explain basis:

III. WATER QUALITY.

- A. What is the existing bacterial quality of the segment? Attach available data. (Where existing quality is better than primary contact criteria, application of primary contact uses or primary contact criteria should be considered to protect existing quality).
- B. Are the data representative of likely contact periods?
- C. Are there sufficient data to make a geometric mean determination (generally not less than 5 samples equally spaced over a 30 day period)?
- D. Has a sanitary survey been conducted demonstrating that there are no human sources of fecal contaminants? (If so, designation of primary contact uses or the primary contact criteria should be considered). Circle as appropriate: **YES NO**

Comment:

IV. POTENTIAL USE.

A. Access to the segment is provided by:

Access to the segment is limited by:

nearby school	Y	N	enclosure/fence	Y	N
roads (paved/unpaved)	Y	N	private property	Y	N
trails (hiking or biking)	Y	N	other _____	Y	N
park land	Y	N			
urban/suburban location	Y	N			
populated area	Y	N			
beach	Y	N			
boat ramps	Y	N			
docks or rafts	Y	N			
other _____	Y	N			

Recreation Use Attainability Worksheet

- B. Physical conditions. Based on conversations with local residents, direct observation, or available data, do any portions of the segment ever provide sufficient flow and/or depth for total body immersion (in a prone position)?

Circle as appropriate: **YES NO**

Explain basis:

- C. Considering access, physical conditions of the segment (factors A and B above) and other relevant information, does the segment have a reasonable potential to support one or more primary contact recreation activities on a reoccurring basis?

Circle as appropriate: **YES NO**

Explain basis:

V. **SUBSTANTIAL AND WIDESPREAD ECONOMIC AND SOCIAL IMPACT.**

Has it been demonstrated that assigning primary contact uses or primary contact criteria would cause substantial and widespread economic and social impact? Attach documentation.

Circle as appropriate: **YES NO**

VI. **CONCLUSION.**

Based on all of the factors characterized above, the segment should have:

Primary contact use and criteria (swimmable)	Y	N	
Secondary contact use and primary contact criteria (swimmable)		Y	N
Secondary contact use and secondary contact criteria	Y	N	
Neither primary nor secondary contact use	Y	N	

Comment:

9. Signature of Reviewer: _____ Date: _____